

JONES DAY

NORTH POINT • 901 LAKESIDE AVENUE • CLEVELAND, OHIO 44114.1190
TELEPHONE: +1.216.586.3939 • FACSIMILE: +1.216.579.0212

DIRECT NUMBER: (216) 586-7221
MAPLATT@JONESDAY.COM

October 18, 2024

VIA ELECTRONIC CASE FILING

Hon. Sarah L. Cave, United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: loanDepot v. CrossCountry Mortgage, et al., No. 1:22-cv-05971-AS-SLC (S.D.N.Y.)

Dear Judge Cave:

As the Court is aware, the parties have been actively proceeding with expert discovery and exchanged initial expert reports and disclosures on August 27, 2024. In that regard, the parties also have been conferring over certain expert discovery issues as they have arisen in order to amicably resolve any potential disputes without the need for intervention from the Court. This process has involved compromises as to certain requested documents, which in turn has resulted in the recent production of additional expert-related documents and the need for a short amount of additional time for the parties to finalize and serve their rebuttal expert reports. In order to allow sufficient time to conclude that process, the parties have mutually agreed to extend the expert rebuttal deadline to November 1, 2024, and the expert deposition deadline to December 6, 2024. The parties also agree that there is good cause for such an extension, as the need for this request was precipitated by the parties' efforts to promptly and efficiently resolve their expert discovery issues while avoiding any need to burden the Court with additional disputes.

Accordingly, the parties jointly and respectfully ask the Court to approve the foregoing proposed deadlines.¹ If Your Honor approves of these deadlines, the parties will advise Judge Subramanian accordingly, and plan to request a short corresponding extension of the dispositive-motion deadlines.

We appreciate the Court's attention to this matter.

Respectfully submitted,

s/ Michael A. Platt

Michael A. Platt

cc: All counsel of record (by ECF)

¹ The parties do not intend or anticipate any further extensions of these proposed deadlines.